

2. On January 27, 2020, Plaintiffs served Travelers with the Writ of Summons. See Affidavit of Service filed on February 4, 2020, attached hereto as Exhibit 2.

3. On or about March 12, 2020, Plaintiffs filed a Civil Action Complaint with the Court of Common Pleas, Philadelphia County. The Complaint sets forth the claim for relief upon which the action is based, and in paragraph 6 of the Complaint seeks damages in excess of \$75,000.00 per the estimate attached as Exhibit A to Plaintiffs' Complaint from Alliance Adjustment Group, Inc. dated July 10, 2018, in the amount of \$249,635.32. A copy of the Complaint is attached as Exhibit 3, as required by 28 U.S.C. § 1446(a).

4. The basis for federal court jurisdiction is 28 U.S.C. § 1332, diversity of citizenship, which provides, in relevant part, that federal district courts have original jurisdiction of civil actions between citizens of different states where the amount in controversy exceeds \$75,000, exclusive of interest and costs.

5. "[A]ny civil action brought in a state court of which the district courts of the United States have original jurisdiction, may be removed by the defendant to the district court of the United States for the district and division embracing the place where such action is pending." 28 U.S.C. § 1441(a). The Eastern District of Pennsylvania is the district that embraces Philadelphia County.

6. Section 1446(b) provides as follows:

(b) The notice of removal of a civil action or proceeding shall be filed within thirty days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based, or within thirty days after the service of summons upon the defendant if such initial pleading has then been filed in court and is

not required to be served on the defendant, whichever period is shorter.

7. This Notice of Removal is timely in that it was filed within 30 days from the point at which Travelers had notice that the action was removable, and less than a year after the commencement of the state court action. See 28 U.S.C. § 1446(b).

8. Upon information and belief, Plaintiff, Anglers Pro Shop, Inc. is a corporation organized under the laws of the Commonwealth of Pennsylvania with its principal place of business located at 3361 Bethlehem Pike, Souderton, Pennsylvania 18964. See Exhibit 3 at par. 1.

9. Upon information and belief, Plaintiff, Joanne Notarangelo is a citizen of the Commonwealth of Pennsylvania, residing at 204 North 6th Street, Perkasie, Pennsylvania 18944.

10. Travelers is, and was at the time the Complaint was filed in Pennsylvania state court, a Connecticut corporation with its principal place of business in Hartford, Connecticut at One Tower Square.

11. A copy of this Notice of Removal is being filed with the Prothonotary of the Court of Common Pleas of Philadelphia County, Pennsylvania, and is being served on counsel of record, in compliance with 28 U.S.C. § 1446(a), (d). See Notice of Filing of Removal as Exhibit 4.

12. Pursuant to 28 U.S.C. § 1446(a), copies “of all process, pleadings, and orders” received by Travelers are attached hereto. Defendant Travelers has not answered or otherwise responded to the Complaint.

13. Removal of Plaintiffs’ case to the United States District Court for the Eastern District of Pennsylvania is required under the circumstances of this case

because all parties are citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

WHEREFORE, Defendant, Travelers Casualty Insurance Company of America, respectfully removes this action to the United States District Court for the Eastern District of Pennsylvania for further proceedings pursuant to this Notice.

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*Attorneys for Defendant, Travelers Casualty
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Dated: April 2, 2020

CERTIFICATE OF SERVICE

I, Michael J. McLaughlin, hereby certify that a true and correct copy of the foregoing Notice of Removal, filed this 2nd day of April, 2020, has been served on the following counsel of record via the Court's Electronic Filing System:

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